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Irish/UK Tax, VAT & Customs

- What Business' Need to Know Post- Brexit

Rose Tierney
In conjunction with MK Brazil
11 February 2021

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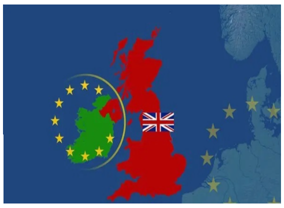
Brexit – the Story so far



- Yes this is where we ended up after a trade deal agreed on 24 December 2020 4 years and 5 months after the UK electorate voted to leave the EU.
- Northern Ireland with a foot in both camps for the next 4 years.

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Brexit – the Story so far

- The Withdrawal Agreement and Northern Ireland Protocol which was agreed between EU and UK was designed to ensure an orderly exit on 31/12/2020 and prevent a hard border on the island of Ireland.
- Instead it was agreed the border would be in the Irish Sea meaning that – the island of Ireland is one customs territory and NI and Great which would mean checks on goods between GB and Northern Ireland.
- But did they actually avoid a border on the island or have they created an invisible paper one? I'll let you decide.

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Brexit – the Story So Far

- So did we get
  - Chaos at the Ports?
  - Gunships in the Channel?
  - No potatoes?

There's Chaos also described a "Mayhem", "Bedlam" "worse than they have ever seen it" by seasoned customs agents.

Brexit – Preparations – Did They Work or Didn't They?

- Smaller businesses – had adopted quite a " Head in the Sand approach"not so much planning going on. Now reality is starting to bite.
- Larger businesses were preparing

– training, recruitment, supply chain mapping, sourcing software & grants, etc

- TURNS OUT SOME BIG COMPANIES WEREN'T READY EITHER!

Brexit Preparations and Unfounded Beliefs

The lack of preparation particularly among small businesses seemed to be down to Brexit Fatigue, Head in the Sand

A lot of misinformation –

" Brexit won't happen"

"If there's a trade deal there's no customs"

"My Courier, Haulier will deal with it"

"My Accountant deals with all that stuff"

"All I need is an EORI number"

"I'll stockpile for January – it will all have settled down by February"

Why Weren't More Businesses Prepared?

- Last Minute Trade Deal
- Unfounded Belief that Trade Deal would solve everything
- Not listening to advice about
  - supply chain mapping ie know where your goods originate and try to cross as few borders as possible
  - Not looking at the finer detail in the commodity codes regarding licences and quotas and prohibitions that no generic trade deal would solve
  - Believing the Media And Political Spin

Politicians and Media Vs Reality

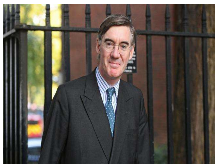
- What were they saying
  - The ports are quiet
  - Trade is flowing fairly well – only 30% of trucks being stopped
  - It's teething problems
  - It's not Brexit – It's Covid
- Reality –
  - Businesses are struggling with the paperwork so the lorries aren't at the ports they're still in yards in GB and ROI.
  - Trade is down 50% on this time last year so haven't seen the worst yet
  - Supermarket shelves a bit bare in places
  - Not much press about all the food that has been dumped.
  - New ROI Import System AIS only launched 23 Nov 2020 - not ready – or well enough tested, prior to Brexit.
  - Software providers overloaded.
  - CDS System for full imports into NI not available yet.
  - Revenue and HMRC Personnel Help?

The Attitude in GB

- It's the EUs fault imposing all these rules on us !
- Ceasing deliveries to ROI & NI – ROI customer too small to be bothered with!
- British suppliers and customers not ready for changes to export/ import rules.
- Off loading responsibility to the ROI importer/exporter - The "Not our Problem - You Deal with It" solution
- Confusion over paperwork requirements between Britain and Northern Ireland.

BUT - THE MOST IMPORTANT THING IS

- the Leader of the House of Commons and Lord President of the Council, Jacob Rees Mogg, has told Parliament that
- "**the key is that we've got our fish back. They're British fish and they're better and happier fish for it**".



VAT Changes from 1 Jan 2021

- For an initial period of four years, The Republic of Ireland (IE) and NI will be parties to a protocol. Under the terms of the Protocol, Northern Ireland maintains alignment with the EU VAT rules for goods, but not for services. However, Northern Ireland is, and will remain, part of the UK's VAT system. NI businesses will continue to submit one UK VAT return and have one UK VAT registration number.
- GB, (England, Scotland & Wales) however, will no longer be a member of the EU and will cease to be bound by, or able to take advantage of, its current status as an EU member state.

VAT Changes 1 Jan 2021

- EVR claims for reclaiming VAT incurred in GB will no longer apply. The EVR system can still be used to reclaim VAT expended on goods in Northern Ireland. To facilitate this, the VAT Directive has been amended. The prefix "XI" should be included in NI trader's VAT number in those transactions. This is in line with the Protocol on Ireland/Northern Ireland.
- Triangulation provisions will no longer include the UK
- Retail Export Scheme minimum spend threshold for UK reduced to €75

VAT Changes from 1 Jan 2021

- No entries on VIES returns required for sales by ROI business to GB
- VIES entries still required for sales to NI but the VIES return won't accept the GB prefix on the VAT number so use XI instead.

VAT Changes from 1 Jan 2021

- Under the terms of the Withdrawal Agreement
- From 1 January
  - Sale of goods to GB will become exports –
    - zero rated as sale outside of the EU , supplier retain proof that customer is established outside the EU and
  - Sale of goods to NI with still be intracommunity sales –
    - zero rated within the EU
    - Eg sale of goods €1000
    - E1 1000 intracommunity sales of goods

VAT Changes 1 Jan 2021

- From 1 January
- Purchase of goods from GB will be imports from outside EU –
  - Vat at point of import but can be postponed until next Vat return and accounted for on a reverse charge basis (postponement claimed on import declaration AISH1)
  - Eg Purchases of €1000 import VAT 21% €210
  - On the VAT 3 Return
  - Box T1 include 210 with sales VAT
  - Box T2 includes 210 with purchases VAT (provided incurred for purposes of business and fully recoverable)
  - Postponed VAT (New box on return) 1,000

VAT Changes 1 Jan 2021

- Purchase of goods from NI will be intracommunity acquisitions of goods from within EU
  - and the reverse charge applies.

  - Purchase of goods €1000 VAT 21% €210
  - On VAT 3 Return
  - Box T1 210 included with sales VAT
  - Box T2 210 with purchases VAT (provided incurred for purposes of business and fully recoverable)
  - Box E2 1,000 net value of intracommunity acquisitions

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VAT Changes from1 Jan 2021

- Sale of Services to GB

B2B

- sales to countries outside EU not subject to Irish VAT
- need proof that customer is established outside EU (ie in GB)

B2C

- most B2C services sold outside EU not subject to Irish VAT

Except those subject to "use and enjoyment" rules.

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B2C VAT Changes 1 Jan 2021

- **Supply of services to a non business customer (B2C)**
- If the following services are provided to non-business customers established outside the European Union (EU), the place of supply is outside the EU. In general, no Irish VAT is chargeable on these supplies.
  - transfers and assignments of copyrights, patents, licences, trademarks and similar rights
  - advertising services
  - the services of consultants, engineers, consultancy firms, lawyers, accountants and other similar services, as well as data processing and the provision of information
  - obligations to refrain from pursuing or exercising, in whole or in part, a business activity or a right
  - banking, financial and insurance transactions including reinsurance, except for the hire of safes

NB watch for potential changes in this area particularly in relation to professional services.

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B2C VAT Changes 1 Jan 2021

- **Supply of services to a non business customer (B2C) (continued**
- no Irish VAT is chargeable on these supplies
  - the supply of staff
  - the hiring out of movable tangible property, with the exception of all means of transport
  - the provision of access to, and of transport or transmission through, natural gas and electricity distribution systems. This includes the provision of other services directly linked thereto
  - telecommunications services
  - radio and television broadcasting services
  - electronically supplied services.

B2C Use & Enjoyment Exceptions

- **Supply of services to a non business customer (B2C)**
- The exceptions:
- Place of supply for some of these services is subject to the use and enjoyment provisions. So if used and enjoyed in the State (ROI) then place of supply for B2C shifts to ROI and Irish VAT is charged.
  - Hiring of movable goods – goods hired to GB consumer and used in ROI
  - Hiring out of means of transport – vehicle hire to GB consumer used in ROI
  - Telecommunications services – radio, television and broadcasting services, telephone cards
  - Financial services- banking, insurance, reinsurance, money transfer intermediary and financial fund management services.

VAT Changes 1 Jan 2021 – Distance Selling

- These are sales from a business to consumers (B2C), in another jurisdiction for example, retail customers or sales to businesses that are not required to be VAT registered.
- EU Distance Selling Thresholds for GB no longer applies.
- If you sell to private consumers B2C in GB – UK import VAT applies.
  - Either register in GB as the importer and declare import VAT and customs duties and deliver DDP
  - Or register in GB as a trader/reseller – account for VAT on a postponed basis and charge UK VAT to end customer.

Distance Sales of Goods to Northern Ireland

- As Northern Ireland maintains alignment with the EU VAT rules for goods, the distance sale rules in respect of sales into Northern Ireland from EU member states will remain the same.
- The distance selling threshold for Northern Ireland is £70,000.
- So if total sales to NI in the year are less than £70,000 you can continue to charge ROI VAT on sales.
- If total sales in the year exceed the threshold then VAT registration in NI will be required.

VAT Changes 1 Jan 2021 – Online Marketplaces

- Online marketplace is a business using a website or mobile phone app (such as a marketplace, platform or portal) to handle the sale of goods to customers
  - Sets the terms and conditions on how goods are supplied to the customer
  - involved in any way in authorising or facilitating customers' payments
  - involved in the ordering or delivery of the goods
- A business will not be classed as an online marketplace if it only provides one of the following services:
  - processing of payments for the supply of the goods to the customer
  - listing or advertisement of goods
  - redirection or transferring of customers to other websites or mobile phone apps where goods are offered for sale, without any further involvement in any sale that might take place on that website or app

VAT and Online Marketplaces

- 1 January 2021 new rules apply to sale to GB
- Consignments of goods with a value of £135 or less that are sold through online platform eg Amazon, Ebay etc and are :
- Outside the UK and sold to customers in Great Britain (England, Scotland and Wales) will have UK supply VAT charged at the point of sale
- Eg B2C sales to GB from ROI through Amazon, Ebay etc
- The £135 limit applies to the value of a total consignment that is imported into GB , not the separate value of individual items that are in a consignment.
- Where those goods are sold through an online marketplace, the online marketplace will be liable for the VAT unless the goods are being sold from Northern Ireland to a Northern Ireland customer, where the seller remains liable for VAT.
- Online marketplaces will also be liable for the VAT on goods of any value that are located in the UK at the point of sale and sold by an overseas business.
- For B2B customers that supply their VAT number VAT will not be collected by the online marketplace.

VAT and Online Marketplaces

- Similar rules will be introduced on 1 July 2021 for importation into EU of goods from outside EU with a value of €150 or less
- ie imports from GB to ROI through online marketplaces.
- It makes the online marketplace responsible for collecting the import VAT at point of sale.
- A new Import One Stop Shop (IOSS) will be introduced from 1 July 2021.So low value less than €150 consignments of goods (excluding excisable goods) from outside EU can have the VAT declared monthly through the IOSS.
- Alternatively the courier, postal operator can collect VAT from the customer and account for it through a deferred VAT payment account .
- These measures are designed to make the collection of VAT on small parcels more efficient

Customs & Logistics

- Under the terms of the withdrawal agreement
- GB drops out of the EU customs union.
- All goods moved into, out of or through GB will require customs declarations.
- Source alternate routes, or alternate suppliers is the advice being trotted out by most government departments.
- It is not that easy –
  - while there is additional capacity on some ferry routes the UK landbridge is a huge part of the logistics industry here.
  - Alternate suppliers of the same quality and style can be hard to source.
- Behind each of those MRNs there is a lot of detail required.

Customs – The Basics

- EAST WEST/WEST EAST – across the Irish sea between GB and ROI and viceversa - it's Import and Export for all Goods
- Full customs declarations will be required will be required
- Otherwise, no goods will move.
- NORTH SOUTH/SOUTH NORTH – provided the goods have been properly imported to NI and are in "free circulation"on the island of Ireland no customs rules apply and EU VAT rules apply

Customs – The Basics

- For every consignment being shipped to ROI from GB ie box, pallet, crate being shipped to a particular consignee you need 3 numbers
  - MRN for Export (from Export Declaration
  - MRN for import (from import declaration)
  - MRN for ENS(Safety & Security Declaration)
  - if its of animal or plant origin you need more documents
  - The MRNs for each consignment on the load will allow a PBN (Pre Boarding Notification)to be created on the Revenue website. The magic number which allows the driver to board the ship and to look up his Channel (again on the Revenue Website) to find out his routing off the ship ie Green , Red etc.

Customs & Logistics Dataset

- More detail will be required on invoices so systems will have to be updated to accommodate an increased dataset.
  - Tariff Code and any preferences or licence or quota requirement
  - Incoterms
  - Origin (copy of cert of origin or registration by exporter on REX)
  - Customs Valuation (usually invoice value +insurance +freight)
  - Gross & Net Weights in kgs
  - Confirmation of Pallet Type

  In addition
  - Route Data – Vehicle & Ship/Aircraft Identity, Route and ETA etc

Tariff Classification Code

- Every exporter will have to have the tariff classification for each product they sell.
- You can get Revenue to determine if its the correct code – BTI Binding Tariff Information
- The importer will use this data to pay customs duty on the import side.
- Use the TARIC database on the Revenue website https://ec.europa.eu/taxation_customs/dds2/taric/taric_consultation.jsp?Lang=en

Incoterms

- First created in 1936 by the International Chamber of Commerce, INCOTERMS are uniform, internationally recognized foreign trade terms that refer to the type of agreement for the purchase and shipping of goods internationally.
- Each term helps users deal with different situations involving the movement of goods.
- 1. Costs: who is responsible for the expenses involved in a shipment at a given point in the shipment's journey?
  2. Control: who owns the goods at a given point in the journey?
  3. Liability: who is responsible for paying damage to goods at a given point in a shipment's transit?

Incoterms

- **EXW** - Ex Works (insert place of delivery)
- **FCA** - Free Carrier (Insert named place of delivery)
- **CPT** - Carriage Paid to (insert place of destination)
- **CIP** - Carriage and Insurance Paid To (insert place of destination)
- **DAP** - Delivered at Place (insert named place of destination)
- **DPU** - Delivered at Place Unloaded (insert of place of destination)
- **DDP** - Delivered Duty Paid (Insert place of destination
- **FAS** - Free Alongside Ship (insert name of port of loading)
- **FOB** - Free on Board (insert named port of loading)
- **CFR** - Cost and Freight (insert named port of destination)
- **CIF** - Cost Insurance and Freight (insert named port of destination)

Incoterms- More detail on the most commonly used

- Delivery Duty Paid (DDP) A shipping term where the shipper/exporter/seller is responsible for all shipping and clearance through customs for ultimate delivery to the consignee. This transaction makes the shipper/exporter/seller responsible for cost and risk of loss during the entire transaction.
- Delivered at Place (DAP) The seller is responsible for arranging carriage and for delivering the goods, ready for unloading from the arriving means of transport, at the named place. (An important difference from Delivered At Terminal DAT, where the seller is responsible for unloading.) Risk transfers from seller to buyer when the goods are available for unloading; so unloading is at the buyer's risk. The buyer is responsible for import clearance and any applicable local taxes or import duties.
- Ex Works (Named point of origin) (EXW) For example: ex factory, ex mill, ex warehouse. Under this term, the price quoted applies only at the point of origin and the seller agrees to place the goods at the disposal of the buyer at a specified place on the date or within the period fixed. All other charges are for the account of the buyer.
- Cost, Insurance and Freight (Named port of destination) (CIF) For example: "CIF Tokyo". A shipping term included in contract of sale, CIF indicates that the seller agrees to take full responsibility for delivering the goods to the port of loading, clear the goods for export, and arrange and pay for transportation and marine insurance over the goods to the named port of discharge, such costs being included in the price of the goods. Nonetheless, all risk of loss of or damage to the goods, as well as any additional costs due to events occurring after the time the goods have been delivered on board the vessel, is transferred from the seller to the buyer when the goods pass the ship's rail at the port of loading. It is up to the buyer to arrange transportation from the port of discharge.

Origin

- Rules of origin determine where goods originate, i.e. not where they have been shipped from, but where they have been produced or manufactured. As such, the 'origin' is the 'economic nationality' of goods traded in commerce. The origin can change to the location where the goods underwent their last significant transformation that added value.
- The tariff classification, value and origin of a good are determining factors based on which the customs tariff treatment is applied. For customs matters, there is a distinction between two types of origins, notably non-preferential origin and preferential origin.
- **Non-preferential origin**
- Non-preferential rules of origin are used to determine the country of origin of goods for the application of the most-favoured nation treatment (MFN) but also for the implementation of a number of commercial policy measures such as anti-dumping and countervailing duties, trade embargoes, safeguard measures and quantitative restrictions or tariff quotas. They are also used for trade statistics, public tenders and origin marking. The EU applies its own set of non-preferential rules of origin provisions, which may be different from those of any other third country.

Origin

- **Preferential Origin**
- Preferential rules of origin determine whether goods qualify as originating from certain countries, for which special arrangements and agreements apply. Where all the requirements are met, goods with preferential origin are eligible to be imported with lower duty rates or at zero rate, depending on the preferential tariff treatment provided for. UK EU trade deal 0% tariff only applies to GB originating goods

- BOI Binding Origin Information
- Where origin is not clear Irish exporter can apply for Customs decision

- Timeline
- 30 days to accept application
- 120 further days to process
- Supplier declarations – supplier declares origin

Customs Valuation

- The value of goods used for customs purposes is usually the transaction value, that is the price actually paid or payable for the goods. This is the invoice price plus the cost of transport and insurance. It also includes any other payments made or to be made for the imported goods.
- There are six methods of valuation that apply in hierarchical order. If method 1 (transaction value) cannot be used then you should use the next method and so on:

1. The transaction value method usually invoice value
2. The transaction value of identical goods.
3. The transaction value of similar goods.
4. The deductive method.
5. The computed method.
6. The residual valuation provision.

Customs valuation and transfer pricing are closely linked.

Direct & Indirect Representation by Customs Agent

- Direct Representation, in this scenario the customs representative acts in the name of and on behalf of another party. The party being represented is the declarant and is obliged to meet all the obligations arising from the declaration. The declarant will be responsible for maintaining the records and also providing an audit trail. At this point it is important to deal with one myth that has developed: there is a view that a customs representative has no responsibility should they make an error. This is not necessarily the case. If the represented party has given clear and accurate instructions and the customs representative makes an error the latter will not be able to rely on the protection of Direct Representation. The view of Revenue/HMRC is that they have failed to act in a competent manner and become jointly and severally liable for the debt
- Indirect Representation, in this case the customs representative acts on behalf of another person but acts in their own name. It is incumbent on the customs representative to maintain a full audit trail with regard to the customs declaration. The Indirect representative shall be jointly and severally liable for all customs liabilities arising from the customs related transactions

Duty Payment Methods

- Once you are registered for an Economic Operators Registration and Identification (EORI) number, you will be assigned a Revenue Trader Account Number (TAN). This is a secure channel through which you can make payments, for example pay import duties.
- Your import duty payments must be made online through the Revenue Online Service (ROS). You can do this by selecting the 'Customs and Excise' payment option and either:
  - provide the required details of your credit or debit card
- or
  - use the option to transfer money from your (the payer's) bank account by Single Debit Instruction (SDI).
- You may allow your customs clearance agent to use your TAN account on your behalf. If you wish to do this, you should complete the Customs and Excise clearance agent form.

Customs Simplifications/Reliefs

- Authorised Economic Operator AEO – it is not mandatory
- AEO status is a certified standard authorisation issued by customs administrations in the European Union (EU). It certifies that an economic operator has met certain standards in relation to:
  - safety and security, systems to manage commercial records, compliance with customs rules,financial solvency, practical standards of competence or professional qualifications.
- This is primarily a trade facilitation measure that recognises reliable operators and encourages best practice in the international supply chain. As an AEO, you could benefit from:
  - recognition worldwide as safe, secure and compliant business partners in international trade
  - lower risk scores in risk analysis systems when profiling
  - Easier access to reliefs and reduction in guarantees required

Customs Simplifications/Reliefs

- Customs Warehousing
- Customs warehousing allows for the storage of non-Union goods in an authorised designated location within the customs territory of the EU without being subject to import duties. The duty liability is discharged if the goods are re-exported outside of the European Union. If the goods are released to free circulation, then the duty and other charges become payable at this time.

- Comprehensive Guarantee
- The holder of a Comprehensive Guarantee Authorisation can: amalgamate all their current customs bonds and guarantees under one comprehensive guarantee, apply for a reduction or waiver in the amount of guarantee for debt which may be incurred subject to meeting specific criteria as outlined in Article 84 DA, reduce to 30% the amount of guarantee for debt which has been incurred where the operator holds the status of Authorised Economic Operator Simplified (AEOC)

Customs Simplifications/Reliefs

- Inward Processing
- You may use the inward processing procedure to obtain relief from Customs Duty and Value-Added Tax (VAT). In order to claim this relief you must:
  - import goods from outside the European Union (EU) to be processed. A process can be anything from repacking or sorting goods to the most complicated manufacturing.
  - release the finished product(s) for free circulation in the EU or re-export them outside the EU.

- Outward Processing
  - Under the outward processing procedure, you may temporarily export European Union (EU) goods for processing or repair in a non-EU country. You can claim full or partial relief from import charges when these goods are re-imported and released for free circulation in the EU.

Customs Simplifications/Reliefs

- TRANSIT – essential for UK landbridge
  - Transit is a customs procedure that allows goods to be moved across international borders under customs control. A guarantee is required to secure all charges on the goods. There are three types of transit:
  - Union transit - allows for the movement of goods within the customs territory of the European Union (EU).
  - Common transit - allows for the movement of goods between:
    - the Union and the common transit countries
    - and
    - the common transit countries themselves.
  - Transport Internationaux Routiers (TIR) - allows for the movement of goods internationally over one or more frontiers. A portion of the journey between the start and end of the TIR operation must be by road.

Customs Simplifications/Reliefs

- Temporary Admission
  - to temporarily import certain goods into the European Union (EU). Examples of such goods are samples, professional equipment, items for auction, exhibition or demonstration. You will usually have to provide security to cover the import charges normally payable on the goods. The security can be in the form of a bank guarantee or cash deposit. Any duties paid on deposit can be reclaimed when the goods are re-exported.
- Eligibility for temporary admission relief is based on the type of goods concerned and their use before they are re-exported. You cannot use temporary admission to import goods to process or repair them.
- You can apply for it electronically or use an ATA Carnet

Customs Simplifications/Reliefs

- ATA Carnet
- You can use an ATA carnet to temporarily import or export certain goods into or out of the European Union (EU). The carnet is issued in the country from where the goods are exported. You must present the ATA carnet with the goods when they arrive in the EU.
- If you use an ATA carnet you will not have to complete the customs declarations or other formalities normally required at import. The carnet also provides security to cover the duty on the goods you import. The following goods can be entered for temporary admission using an ATA carnet:
  - commercial samples
  - professional equipment
  - goods for exhibitions, fairs or trade shows.
  - Small tools of trade
- https://www.dublinchamber.ie/business-services/export-services/ata-carnets

Customs Simplifications/Reliefs

- All relieving provisions require an application through the CDS.
- There is a lead in time – 30 days to accept 120 days to process.
- Businesses who need these simplifications should be acting now.
- Businesses also need to decide whether processing will be carried out inhouse – requires staff training and investment in software- or outsourced.

Who will supply the key pieces of information I need?

- For Importers – The Exporter should supply a lot of the detail
- What if they don't ?– they are not ready.
- No Data= no sale by your supplier and no purchase by you – Can you obtain alternative stocks at short notice?
- Work with them to extract the information from their systems – should already have commodity codes if goods imported to UK and not significantly transformed,
- Supplier/Carrier has routing details.
- Who knows about the packaging and the Weights – Gross & Net? Weights on packing slips
- Who's paying for freight and insurance? Will that division/split of costs change?

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Who will supply the key pieces of information I need?

- For Exporters – you should have most of the details within your systems.
- Get commodity code – if unsure look for BTI
- Get the standing dataset for each customer and route.

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When should I be reviewing our costs and pricing?

- About 4 ½ years ago !!!
- There's a huge administrative burden on getting goods into Ireland or out of Ireland – that means costs increase.
- If costs increase prices must increase.
- Have the conversation with your suppliers and customers about who is bearing the additional costs and the impact on prices.

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Northern Ireland and the Sea Border

- Register for the Trader Support Service if
  - Moving Goods from GB to NI or
  - bring goods into Northern Ireland from outside the UK
- Free to Use
- Trader registers but can assign an additional user to have someone make declarations on behalf of company
- From 1 January 2021 you'll need an EORI number that starts with XI to:
  - move goods between Northern Ireland and non-EU countries
  - make a declaration in Northern Ireland
  - get a customs decision in Northern Ireland
  - Get a GB EORI first and then apply on HMRC Online Services to get an XI EORI

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Northern Ireland and the Sea Border

- TSS – currently only Safety & Security Declaration and Simplified Frontier Declaration can be submitted.
- Supplementary Declaration should be available by end of February
- Options coming onboard for transiting goods from GB to NI via ROI and GB to ROI via NI
- From 1 Jan to date over 100,000 consignments – how many commodity codes???

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Customs - Not all about Tax

- The biggest part of customs is not the tax it the safety, security and risk analysis
- Reduce the risk – reduce the delays – reduce the cost.
- Brexit is here but there are Jobs you can still do
  - Review whether you should apply for AEO
  - Do you need a deferred account – then you need a comprehensive guarantee.
  - Would any of the reliefs – inward processing, outward processing, customs warehousing facilitate your business?
  - Are you uncertain about any commodity codes – apply for BTI

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Questions

- **Sample Question 1**

- What is the procedure for sending products to the UK to have work carried out & then returned to Ireland for final assembly before sale.
  - Does the item need to carry a commodity code & should it be for inward processing, apparently this will eliminate any vat or tax going into the UK & also on its return back into Ireland.
  - Also what paperwork should accompany the product on its return to Ireland

Questions

- **Sample Question 2**

- What is the Vat treatment of services supplied to an ROI company by a UK based company? The supply for example might be remote IT support so there is no physical requirement for any individual to leave the UK personal to visit ROI.

Thank you for your attention.

QUESTIONS?

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